

**UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

Case No. 24-1190, 24-1204

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PAUL SHAO,

Plaintiff – Appellant,

v.

ALLSTATE INSURANCE COMPANY,

Defendant – Appellee

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On Appeal From Orders Of The  
United States District Court, Eastern District of Virginia

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
APPELLEE’S RESPONSE BRIEF**

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**Defendant– Appellee**

By Their Attorney,

          /s/ J. Scott Humphrey          

J. Scott Humphrey

Katie Burnett

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**Dated: May 10, 2024**

Defendant-Appellee Allstate Insurance Company (“Allstate”) respectfully moves pursuant to Fed. R. App. P. 26(b) for an adjustment to the briefing schedule. Specifically, Allstate requests a ten-day extension of time to file its response brief to Plaintiff-Appellant Paul Shao’s three principal briefs.<sup>1</sup> Allstate intends to file an omnibus response brief that address all three briefs filed by Appellant.

To date, the total number of days of extension granted to Allstate in this appeal is 0. If the Court grants this motion, the time for filing Allstate’s response brief would be extended from May 13, 2024 to May 23, 2024. Allstate respectfully submits that there is good cause for this extension due to counsel’s other significant time commitments, the lengthy appeal filed in this matter, and the number of issues raised by Shao’s appeals. Further, Appellant submitted three principal briefs. Allstate intends to provide one omnibus response to all.

The parties have met and conferred regarding the requested extension, which is not opposed by Appellant. No prejudice will occur to the Court or any Party if the Court grants the requested ten-day extension. Therefore, Allstate respectfully requests that this Court grant the motion for an adjustment to the briefing schedule

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<sup>1</sup> This case is a consolidation of two appeals: No. 24-1190 and No. 24-1204. On April 29, 2024, Appellant filed his Informal Opening Brief for No. 24-1190. (Dkt. 17). On May 1, Appellant filed his Informal Opening Brief for No. 24-1204. (Dkt. 20). Shao also filed an Amendment to his Informal Brief that same day. (Dkt. 21).

by extending the deadline for the filing of Allstate's response brief by two weeks,  
from May 13, 2024 to May 23, 2024.

**Date: May 10, 2024**

**Respectfully submitted,  
Defendant – Appellee  
Allstate Insurance Company,**

/s/ J. Scott Humphrey

J. Scott Humphrey

Katie Burnett

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this May 10, 2024, I electronically filed the foregoing document with the United States Court of Appeals for the Fourth Circuit by using the CM/ECF system. I certify that I caused a true and correct copy of the foregoing to be served via email and US Mail upon the following:

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/s/ J. Scott Humphrey

J. Scott Humphrey

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